

Magna Ref: 905/AP/07B
Date: 7 September 2026

Highways Development Control
Reading Borough Council

[via email]

Dear Sir/Madam,

RE: PL/26/0944 – BANANA MOON DAY NURSERY, 371 GOSBROOK ROAD, CAVERSHAM, READING, RG4 8ED – RESPONSE TO HIGHWAY AUTHORITY COMMENTS

We write further to the Highway Authority's consultation comments in respect of planning application PL/26/0944 for the proposed increase in capacity at Banana Moon Day Nursery, 371 Gosbrook Road, Caversham.

The purpose of this letter is to respond to the matters raised, provide further clarification regarding staff travel and parking arrangements, and present the additional parking accumulation evidence supplied by the Applicant.

Highway Authority's Comment 1:

In accordance with the adopted Parking Standards and Design SPD, a day nursery would be required to provide parking provision of 1 space per 3FTE staff and 1 drop off space per 10 pupils with flexible pick up and drop off times. The forecourt area to the front of the building provides space for up to seven vehicles and it is stated that the parking area is used for short-stay drop-off and pick-up activity associated with the nursery.

Response:

The parking standards are noted. However, it is important that the numerical standards are considered alongside the observed operational characteristics of this established nursery.

Firstly, the staff numbers referred to within the TS represent the overall staffing complement and should not be interpreted as the number of Full-Time Equivalent (FTE) staff present at the nursery simultaneously. Paragraph 2.3.1 of the TS clearly states that the existing staff complement includes staff who are not full-time, while paragraph 2.3.7 confirms that some staff work on a part-time basis. The same principle applies to the anticipated future staffing level.

Accordingly, it would not be appropriate to apply the standard of 1 space per 3 FTE staff directly to the headline number of individual employees.

In respect of parent drop-off and pick-up, the site provides 7 parking spaces within the forecourt. The travel survey was undertaken whilst the nursery was operating with a high turnover of the majority of the 60 children enrolled, representing what is close to the peak level of activity now proposed. This provides the Highways Authority with direct, observed real-world data of the site's near-maximum operational impact, rather than a flawed theoretical calculation.

The observed data established that approximately 32% of children travelled by car and, importantly, arrivals and departures are staggered throughout the morning and afternoon. Parent vehicles remain within the forecourt only for the short period required to drop off or collect a child.

This is also supported by the more recent parking accumulation exercise undertaken on Wednesday 26 August 2026. The survey recorded the number of vehicles physically present within the forecourt at 30-minute intervals throughout the nursery day. At no surveyed time did the seven-space forecourt reach capacity.

The highest recorded accumulation was five vehicles, comprising:

- 3 staff vehicles and 2 parent/carer vehicles at 07:30;
- 4 staff vehicles and 1 delivery vehicle at 10:30; and
- 3 staff vehicles and 2 parent/carer vehicles at 16:00.

The temporary increase to 4 staff vehicles between approximately 10:00 and 12:00 reflected an overlap between kitchen staff, rather than the normal staff parking allocation. Otherwise, approximately 3 staff vehicles were present throughout the day, reducing to 2 by 18:30.

The survey therefore demonstrates that, even with the current staff parking rota operating, spare capacity remained available within the forecourt throughout the surveyed day.

The observed evidence is consequently considered considerably more informative in assessing the practical operation of this established nursery than a simple theoretical application of the parking standards in isolation.

Highway Authority's Comment 2:

Staff travel patterns are more varied, with 57% travelling by car, 24% walking, and 19% using public transport. It is stated that the majority of staff currently park away from the nursery, with only one member of staff using the on-site parking due to disability. The travel survey data indicates that staff-related vehicle activity equates to a total of 8 arrivals and 8 departures recorded throughout the day.

However, there appears to be a degree of inconsistency between the survey data and the supporting narrative. Whilst paragraph 2.3.9 states that only one disabled staff member parks on-site and that the majority of staff park elsewhere, the survey records 8 staff vehicle arrivals and 8 staff vehicle departures per day. If staff parking demand is limited to a single on-site space, it is unclear how the recorded staff vehicle movements are accommodated. The Transport Statement does not provide justification for the staff arrivals and departures, nor does it provide information about where staff park away from the nursery.

Response:

There appears to be a misunderstanding regarding what the staff arrival/departure information within the TS represents.

The staff mode-share assessment and staff parking accumulation are two separate matters.

The identification of a member of staff as travelling by car does not mean that the vehicle is parked within the nursery forecourt. A staff member may, for example, travel to the vicinity of the nursery by car, park elsewhere and complete the remainder of the journey on foot. Similarly, a staff member may be dropped off or picked up by another vehicle without generating any parking demand whatsoever.

This is relevant to the surveyed operation. The Applicant has confirmed, for example, that 1 member of staff identified as travelling by car is routinely dropped off and collected and therefore does not require a parking space.

The Applicant has also now clarified the source of the arrival and departure information. Staff attendance is recorded through the nursery's biometric attendance system and established staff rota. Accordingly, the times identified within the survey represent the times at which individual staff arrive at and depart from work. **They were not intended to represent observations of vehicles physically entering and exiting the nursery forecourt.**

This distinction is important. The 8 staff car trips identified within Table 2A therefore **do not** equate to 8 vehicles being parked within the forecourt simultaneously. Table 2A is an arrival/departure profile and not a parking accumulation table. Indeed, **paragraph 2.3.7 immediately preceding the table also confirms that some staff work on a part-time basis.**

The Applicant has additionally provided further clarification regarding the current parking arrangements. Up to approximately 3 members of staff are normally permitted to park within the forecourt through an internally managed rota. This supersedes the previous understanding recorded within the TS that only the member of staff requiring disabled parking routinely parked on site.

This updated information does not alter the staff trip-generation assessment. It simply provides a more detailed understanding of where staff vehicles are parked once those staff have travelled to work.

Staff who drive but are not allocated an on-site parking space generally park away from the nursery at dispersed locations. The Applicant has identified the principal locations as:

- Star Road;
- Henley Road; and
- Donkin Hill.

These locations contain unrestricted parking. In addition, 1 member of staff currently uses a space within a pub car park on Star Road under a paid arrangement, and the nursery is investigating the availability of additional spaces through that arrangement.

The Applicant advises that, on a typical day, approximately 3 to 5 staff vehicles require off-site parking.

It is also important not to equate the reported 57% staff car mode share with a requirement for 57% of the overall staff complement to be provided with parking on site. The staffing figure represents the overall pool of employees and includes part-time staff working different days and hours.

Moreover, some car travellers are dropped off, some car-share, some park remotely and others use the managed on-site rota.

The more recent recruitment pattern also demonstrates that the staff travel profile is moving towards sustainable modes. Of the 3 recent recruits, 2 walk or use public transport and the third car-shares. The nursery also makes clear to new employees that on-site staff parking cannot be guaranteed and encourages recruitment and travel arrangements which minimise reliance upon parking at the site.

There is therefore no inconsistency between staff travelling by car and those vehicles not being parked within the nursery forecourt. They are fundamentally different measures.

Highway Authority's Comment 3:

Whilst the submitted arrival/departure survey provides information on vehicle trip generation, it does not demonstrate parking demand or parking accumulation associated with the site. Given the discrepancy between the recorded staff vehicle movements and the Applicant's assertion that only one disabled staff member parks on-site, further evidence is required to substantiate parking demand and parking arrangements. A parking accumulation survey, undertaken over a representative period, should be provided to demonstrate the level of on-site parking demand and to identify whether any overspill parking occurs on the surrounding highway network. Full details of the number of staff and children present on-site during the survey period should also be provided to enable the survey findings to be fully assessed.

Response:

Additional parking accumulation evidence has now been provided.

The Applicant's management team undertook an accumulation survey on Wednesday 26 August 2026, deliberately selecting one of the nursery's busier operating days.

The survey recorded the number of staff, parent/carers and delivery vehicles physically occupying the forecourt at 30-minute intervals between 07:30 and 18:30.

The results demonstrate that the forecourt parking area remained below capacity throughout the day.

The maximum observed accumulation was 5 vehicles. This occurred at 07:30, when 3 staff vehicles and 2 parent/carers vehicles were present; at 10:30, when 4 staff vehicles and 1 delivery vehicle were present; and at 16:00, when 3 staff vehicles and 2 parent/carers vehicles were present.

For much of the day only 3 staff vehicles were present and no parent/carers vehicles were occupying the forecourt.

The 4 staff vehicles recorded between 10:00 and 11:30 arose from a temporary overlap between two kitchen staff, 1 commencing work and another finishing around midday. This was therefore an operational overlap rather than evidence of a general requirement for 4 staff parking spaces.

The survey also demonstrates the very short duration of parent parking. For example, 2 parent/carer vehicles were recorded at 07:30, reducing to 1 by 08:00 and 08:30 and none by 09:00. Similarly, during the afternoon, 1 parent/carer vehicle was recorded at 15:30, 2 at 16:00 and none by 16:30.

In addition, it should be noted that the parking area is clearly marked with an IN sign on Gosbrook Road and a separate OUT sign on Mill Road with plenty of space to manoeuvre vehicles in and out of the parking spaces and in and out of the nursery.

This is consistent with the nursery operating more as a drop-off/pick-up facility rather than a conventional long-stay car park.

It is acknowledged that the 26 August survey was undertaken during the school summer holiday period. However, the Applicant has explained that the nursery operates for 51 weeks of the year and that occupancy does not fluctuate in the same manner as a school. Typically, only a small proportion of children are absent on holiday at any particular time and nursery occupancy therefore remains comparatively consistent throughout the year.

Furthermore, the principal purpose of the additional exercise was to establish the physical accumulation of vehicles within the forecourt, particularly staff vehicles, which was the matter specifically queried by the Highway Authority. The results provide direct evidence that the current managed parking arrangement operates within the available seven-space capacity.

The Applicant has nevertheless confirmed that the survey exercise can be repeated during a conventional term-time week if the Highway Authority considers that necessary.

In light of the evidence now supplied, however, there is no indication that the existing operation results in the on-site forecourt reaching capacity or generates material parking accumulation within the site.

Highway Authority's Comment 4:

For completeness, the Applicant has provided further operational information since preparation of the Transport Statement.

Paragraphs 2.3.4, 2.3.9, 4.3.6 and 5.3.6 of the TS state that only 1 member of staff routinely parked within the forecourt due to disability. This reflected the information available when the TS was prepared. The Applicant has subsequently clarified that approximately 3 staff vehicles are generally permitted to park within the forecourt under a managed rota arrangement.

The Highway Authority is therefore invited to read those references subject to this updated clarification.

This does not alter the traffic-generation data, staff mode-share assessment or conclusions of the TS. Indeed, the subsequent parking accumulation survey provides direct evidence that the revised understanding of staff parking remains capable of being accommodated within the existing seven-space forecourt whilst retaining capacity for parent drop-off and pick-up.

Summary:

The additional information provided by the Applicant addresses the matters raised by the Highway Authority.

In particular, it demonstrates that:

- the staff numbers identified within the TS represent the overall staffing complement and include part-time employees, rather than the number of FTE staff simultaneously present;
- staff car mode share should not be conflated with on-site parking demand;
- staff arrival and departure times were derived from biometric attendance information and staff rota records and are not intended to represent vehicles entering or leaving the nursery forecourt;
- some staff travelling by car generate no parking demand because they are dropped off, picked up or car-share;
- approximately 3 staff vehicles are normally accommodated on site through a managed rota, with approximately 3 to 5 staff vehicles parking remotely on a typical day;
- identified staff off-site parking locations include Star Road, Henley Road and Donkin Hill, together with an existing paid parking arrangement on Star Road;
- recent staff recruitment demonstrates increased use of walking, public transport and car sharing; and
- the parking accumulation survey undertaken on 26 August demonstrates a maximum observed accumulation of five vehicles within a seven-space forecourt, leaving a minimum of two spaces available even at the busiest observed times.

Accordingly, the additional evidence does not identify a parking capacity or highway safety issue arising from the proposed increase in nursery capacity. Rather, it supports the conclusion of the submitted Transport Statement that the existing access and forecourt arrangements can continue to satisfactorily accommodate the proposed operation.

Yours sincerely,

Thank you.



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